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April 28, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**RE: RATIFICATION OF EMERGENCY ORDER for Suspension of Regulatory and
Statutory Deadlines; Modification to Filing and Service Requirements:
M-2020-3019262**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("Commission") is the Petition to Intervene of the Pennsylvania Energy Consumer Alliance ("PECA"), Met-Ed Industrial Users Group ("MEIUG"), Penelec Industrial Customer Alliance ("PICA"), Philadelphia Area Industrial Energy Users Group ("PAIEUG"), PP&L Industrial Customer Alliance ("PPLICA"), and West Penn Power Industrial Intervenors ("WPPII") (collectively, "Industrial Customers"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Kenneth R. Stark

Counsel to the Pennsylvania Energy Consumer Alliance,
Met-Ed Industrial Users Group, Penelec Industrial
Customer Alliance, Philadelphia Area Industrial Energy
Users Group, PP&L Industrial Customer Alliance, and
West Penn Power Industrial Intervenors

c: Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL

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PP&L Industrial Customer Alliance, and
West Penn Power Industrial Intervenors

Dated this 28th day of April 2020 at Mechanicsburg, Pennsylvania



Petition to Intervene in M-2020-3019262 A7473064.docx

DocVerify ID: F1C7E7FB-620F-4DC4-BF32-7AA189A00544
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E-Signature Summary

E-Signature 1: Kenneth R. Stark (KRS)

April 28, 2020 12:51:41 -5:00 [970E6B995ABE] [24.104.68.94]
kstark@mcneeslaw.com (Principal) (Personally Known)

E-Signature Notary: Tricia R. Cordivano (TRC)

April 28, 2020 12:51:41 -5:00 [0DB25321D2EA] [73.101.12.43]
tcordivano@mcneeslaw.com
I, Tricia R. Cordivano, did witness the participants named above electronically sign this document.



**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RATIFICATION OF EMERGENCY ORDER :
for Suspension of Regulatory and Statutory : M-2020-3019262
Deadlines; Modification to Filing and Service :
Requirements :

**PETITION TO INTERVENE OF THE
PENNSYLVANIA ENERGY CONSUMER ALLIANCE,
MET-ED INDUSTRIAL USERS GROUP,
PENELEC INDUSTRIAL CUSTOMER ALLIANCE,
PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP,
PP&L INDUSTRIAL CUSTOMER ALLIANCE, AND
WEST PENN POWER INDUSTRIAL INTERVENORS**

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.74, the Pennsylvania Energy Consumer Alliance ("PECA"), Met-Ed Industrial Users Group ("MEIUG"), Penelec Industrial Customer Alliance ("PICA"), Philadelphia Area Industrial Energy Users Group ("PAIEUG"), PP&L Industrial Customer Alliance ("PPLICA"), and West Penn Power Industrial Intervenors ("WPPII") (collectively, "Industrial Customers") hereby file this Petition to Intervene in the above-captioned proceeding.

In support of its Petition to Intervene, the Industrial Customers assert the following:

1. PECA is an unincorporated association of large energy consumers that advocates for statewide energy and environmental policies that will advance the interests of large commercial and industrial ("Large C&I") customers. In addition to PUC proceedings, PECA advocates to protect its interests before other government agencies, the legislative branch, and the executive branch.

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2. MEIUG is an ad hoc group of energy-intensive Large C&I customers receiving electric service from the Metropolitan-Edison Company (“Met-Ed”). PICA is an ad hoc group of energy-intensive Large C&I customers receiving electric service from the Pennsylvania Electric Company (“Penelec”). PAIEUG is an ad hoc group of energy-intensive customers receiving electric service from PECO Energy Company (“PECO”). PPLICA is an ad hoc group of energy-intensive Large C&I customers receiving electric service from PPL Electric Utilities (“PPL”). WPPII is an ad hoc group of energy-intensive Large C&I customers receiving electric service from the West Penn Power (“West Penn”).

3. The Industrial Customers annually consume substantial amounts of electricity in their manufacturing and operational processes, and electricity costs comprise a significant element of their respective costs of operation.

4. The names and address of the Industrial Customers’ attorneys are:

Kenneth R. Stark (Attorney I.D. #312945)
Jo-Anne Thompson (Attorney I.D. #325956)
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5. The Industrial Customers’ members include commercial, institutional, and industrial customers of electricity that have participated in various proceedings before this Commission. Because the COVID-19 pandemic (“COVID-19”) has detrimentally impacted the economic well-being of businesses and consumers throughout Pennsylvania and materially impacted power demand and energy consumption, the Industrial Customers have a significant interest in participating in this proceeding and desire to monitor PUC regulatory and procedural changes due to COVID-19.



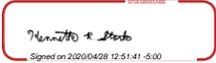
6. The Industrial Customers thus have an interest in this proceeding that is not represented by any other party of record; consequently, the Industrial Customers satisfy the standards for intervention under Section 5.72 of the Commission's Regulations, 52 Pa. Code § 5.72.



WHEREFORE, the Industrial Customers respectfully request that the Pennsylvania Public Utility Commission grant this Petition to Intervene, providing the Industrial Customers with full-party status in this proceeding, as well as any other relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By  Signed on 2020/04/28 12:51:41 -5:00
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Dated: April 28, 2020



